

Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

In the Matter of)	
)	
Annual Assessment of the Status of)	MB Docket No. 07-269
Competition in the Market for the)	
Delivery of Video Programming)	

COMMENTS OF THE WRITERS GUILD OF AMERICA, WEST, INC.

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Introduction

Writers Guild of America, West, Inc. (WGAW) is pleased to submit the following comments in response to the Federal Communications Commission's (FCC) April 20, 2011 Further Notice of Inquiry (FNOI), MB Docket No. 07- 269.

WGAW is a labor organization representing more than 8,000 professional writers working in film, television and new media, including news and documentaries. Virtually all of the entertainment programming and a significant portion of news programming seen on television and in film are written by WGAW members and the members of our affiliate, Writers Guild of America, East (jointly, "WGA").

The WGAW is extremely concerned with the lack of meaningful competition and diversity in the market for the delivery of video programming. The detrimental impact market concentration has on news, information, and entertainment content across distribution platforms harms both democratic discourse and the democratic process. While a television market that offers more than 500 channels and in some areas, the choice of up to three providers of cable television service, may outwardly appear to be competitive and diverse, closer examination reveals a different truth. Currently, a small number of vertically integrated media companies produce virtually all of the original content viewed by Americans on the major broadcast and cable networks. These are the same companies that own the broadcast networks and the most widely distributed and watched cable channels. Compounding the concentration in production and exhibition is a consolidated market of multichannel video programming distributors (MVPDs). Mergers, such as the recently approved Comcast- NBC Universal (NBCU) combination, further diminish competition. The result of FCC policy over the past two decades is a media marketplace in which independent content has little chance of reaching the public and the content that is offered to consumers

comes from a dwindling number of sources. For writers, both vertical integration and horizontal consolidation have eliminated a competitive market for their creative works.

The FCC seeks further comment in preparation of its “Annual Assessment of the Status of Competition in the Market for the Delivery of Video Programming.” As we explain below, the concentration of market power that exists throughout the television marketplace, from content production to distribution in consumers’ homes causes harm to competition and diversity. The FCC has previously considered remedial measures that, if implemented, would represent substantial progress towards a healthy, dynamic video delivery market. We urge the FCC to take specific actions to promote its mandate of protecting a competitive and diverse media marketplace.

The Television Marketplace Lacks Effective Competition and Meaningful Diversity

The market for delivery of video programming as well as that for content creation (studios and producers) and aggregation (television networks) is controlled by a handful of powerful companies. At each level within the television value chain the market has become horizontally concentrated. Vertical integration between studios and networks has further reduced competition. The WGA does not believe that media consolidation has been positive either for consumers, who are offered increasingly homogenized content, or content creators, who face a shrinking market in which to sell their product. The repeal of the Financial Interest and Syndication (Fin-Syn) rules in the 1990’s facilitated a wave of industry consolidation that vertically integrated production and exhibition in television, combining the networks with previously independent studios. This historical trend includes Viacom’s 1994 purchase of Paramount and the subsequent merger in 1999 with CBS, Disney’s acquisition of Capital Cities/ABC in 1995, Time Warner’s purchase of Turner Broadcasting in 1996, and NBC’s

combination with Universal in 2003.¹ Broadcast networks, which were once required to air independently-owned content, chose to merge with studios and shift away from independent production in favor of in-house content or content produced by other vertically-integrated media conglomerates. The growth of cable networks, while increasing the sheer number of outlets, has not increased market competition or diversity because many of the most widely distributed cable networks are owned by the same companies that own the broadcast networks. Further, a majority of the original primetime programming aired on cable that would provide a substitute to broadcast network programming is in fact produced by the same companies.

Media Production

In the FNOI, the FCC asks for “data, information, and comment that will help us analyze the number and size of content creators and the evolving relationship between content creators and the firms that distribute video content.”² The WGAW’s analysis of primetime series on the fall broadcast network schedule has found that the amount of independently produced content offered to consumers continues to shrink. Currently, the same five companies that own the broadcast networks produce an overwhelming majority of the series aired on network primetime.³ Since 2008, independent programming as a percentage of the fall primetime lineup has fallen from 22 percent to a mere 13 percent. The WGAW defines independent producers as studios or production companies that are not owned or affiliated with a major broadcast or cable network or an MVPD provider. Such a definition is essential because it exposes the true amount of programming that reaches the air without the market power or guaranteed distribution

¹ CBS and Viacom split in 2005 with Paramount film production and distribution remaining with Viacom and Paramount television production with CBS; both remain controlled by Sumner Redstone through National Amusements.

² Federal Communications Commission. “Further Notice of Inquiry.” Annual Assessment of the Status of Competition in the Market for the Delivery of Video Programming.. April 21, 2011 P. 25. From FCC website, MB Docket No. 07-269, http://transition.fcc.gov/Daily_Releases/Daily_Business/2011/db0421/FCC-11-65A1.pdf.

³ The media conglomerates represented include CBS Corporation, Comcast-NBCU, News Corporation, Time Warner and The Walt Disney Company.

provided by vertical integration.

Broadcast Network Primetime Fall TV Series⁴

	1989	1999	2008	2009	2010
Independently Produced Series	76%	28%	22%	14%	13%
Media Conglomerate Produced Series ⁵	24%	72%	78%	86%	87%

Source: WGAW Analysis⁶

It is worth noting that the independently produced series airing on broadcast networks in recent years are almost all so-called “reality” programs like *American Idol*, *The Biggest Loser* and *The Apprentice*.⁷ These programs are typically enjoyed by viewers only once and do not generate the same revenue from reruns, syndication sales, DVDs or other revenues streams that scripted shows do. As a result, the media conglomerates are less interested in owning these programs. As such, it seems clear that even the 13% figure is an overstatement; if the major media conglomerates wanted to own these nominally “independent” productions, their market power would allow them to do so. In contrast, 20 years ago under the Fin-Syn regulations, 76 percent of the primetime lineup was independently produced, including such successful shows as *Doogie Howser, M.D.*, *The Wonder Years*, *Cosby Show*, *Who’s the Boss* and *Designing Women*.

The trend discussed here was confirmed by the GAO’s report on media programming, which found that in 2009 82.5 percent of broadcast network primetime hours were from broadcast network-affiliated studios.⁸ While the fall lineup is a snapshot of the planned regular

⁴ For the purposes of our analysis of the Fall television schedules and WGAW member earnings and employment, Sony Pictures Television is considered independent for the entire period, as it is not affiliated with a broadcast network. Warner Bros. Television is considered independent prior to the creation of the WB Network in 1995. Disney Television is considered independent prior to the acquisition of ABC in 1995. Universal is considered independent prior to its 2003 merger with NBC.

⁵ The media conglomerates represented include CBS Corporation, Comcast-NBCU, News Corporation, Time Warner and The Walt Disney Company.

⁶ All the series analyzed in the report are listed in the Appendix of this filing.

⁷ Among dramas and comedies on the fall 2010 lineup, only two half-hour comedies were considered independently produced. These programs were “Running Wilde”, produced by Lionsgate and “Community,” produced by Sony.

⁸ United States Government Accountability Office, “Factors Influencing the Availability of Independent Programming in Television and Programming Decisions in Radio,” March 2010, U.S GAO, p. 13.

programming and actual programming over the year varies from the pattern schedule, it is a useful and valid way to measure who has laid claim to a segment of primetime hours. Further, as network primetime remains the most important and valuable time period for advertisers and viewers, it is valuable to assess who owns the programs that populate this prime real estate.

The table below provides further detail on the amount of independently produced programming airing on each network. The table highlights the trend of diminishing space for independent programming across each network.

Broadcast Network Fall Lineup

Percent Independently Produced	1989	1999	2008	2009	2010
ABC	69%	22%	33%	25%	20%
CBS	83%	27%	4%	4%	9%
CW	--	--	36%	11%	10%
Fox	50%	37%	29%	20%	11%
NBC	88%	32%	17%	13%	16%
UPN	--	50%	--	--	--
WB	--	7%	--	--	--
Total	76%	28%	22%	14%	13%

Source: WGAW Analysis

While the broadcast networks have all but eliminated independently produced programming from their primetime schedules, they have also increasingly engaged in a strategy of self-sourcing for programming. By 2010, a majority of the primetime series programming on each network was produced by an in-house studio, as outlined in the table below.

Broadcast Network Fall Lineup: Series Produced by In-House Production Entity

Network	2008	2009	2010
ABC	50%	48%	60%
CBS	35%	57%	61%
CW	64%	89%	90%
FOX	53%	67%	72%
NBC	67%	81%	63%

Source: WGAW Analysis

During the Fin-Syn era, a majority of programming aired on broadcast networks was independently produced. The networks pointed to the rise of cable outlets as increased market competition and effectively argued that the FCC should eliminate the requirements for guaranteed space for independently produced content on broadcast television. As we have demonstrated, the result on broadcast has been an almost complete elimination of independently produced content. We have conducted a similar analysis of original primetime programming on cable to demonstrate how the expansion of television networks has not greatly increased the space for independently produced content. While there are hundreds of cable channels which air a variety of programs, we have focused our analysis on primetime programming that is most closely substitutable for broadcast television series. These are original dramas and comedies that are produced for the same viewers that broadcast networks attract. Over the past three television seasons, we found programming of this type on 16 basic cable networks. Of these new competitors to broadcast television programming, only 30 percent were produced by a company not owned by a vertically integrated media company. That 70 percent of these series are produced by the same media conglomerates that own the broadcast networks further highlights the market power by these companies.

Analysis of Primetime Original Programming on Basic Cable Networks⁹

	2007-2008	2008-2009	2009-2010
Independently Produced Series	11	19	21
Media Conglomerate Produced Series ¹⁰	26	40	49
Total	37	59	70
Percent Independent	30%	32%	30%

Because viewers are watching television programming from fewer sources, WGAW members are also faced with fewer employers. In 1989, 89 percent of TV writing jobs and 88 percent of TV writing compensation came from outside the conglomerates. By 2010, those figures had declined to 25 percent and 17 percent, respectively.¹¹ The pivotal moment was the repeal of Fin-Syn in the 1990s. The chart on page 8 highlights both employment and compensation for WGAW members, as reported to the Guild. It paints a clear picture of the decline in independent employment opportunities for WGAW members. Despite the expansion of television outlets, both jobs and compensation have shifted from independent studios and production companies to vertically integrated media conglomerates.

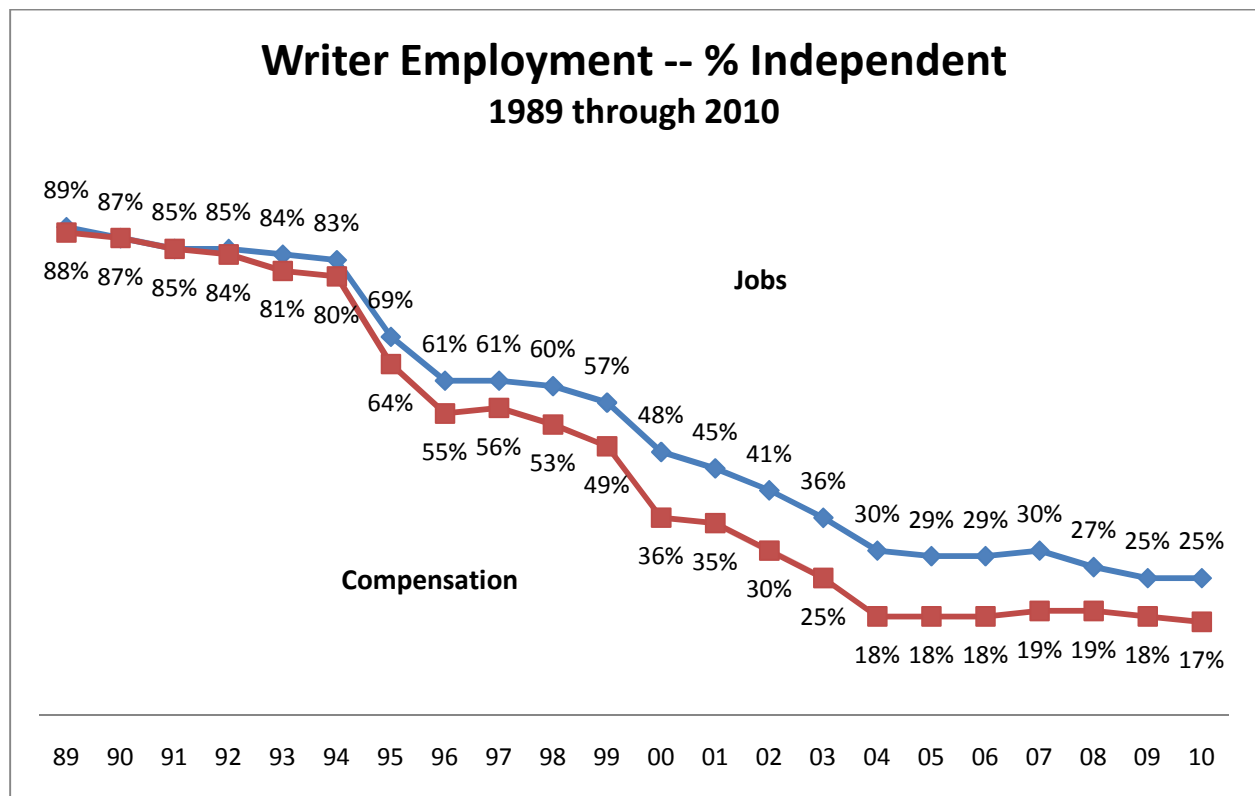
The consolidation has caused considerable harm to the creative community. The market power possessed by these media conglomerates allows them to capture a majority of the economic value created by television production, to the detriment of actual content creators. Studios, now guaranteed distribution by virtue of having vertically integrated with networks, no longer compete for talent as a means of differentiation. The inordinate power held by these media conglomerates allows them to make increasing demands on the talent community. The

⁹ A full list of the series analyzed is included as an appendix to this filing.

¹⁰ The media conglomerates represented include Comcast-NBCU, News Corporation, Time Warner, The Walt Disney Company and Viacom.

¹¹ These figures include all broadcast, cable and pay TV programming written by WGAW members, not just prime time.

result is that writers must do more work for less pay and are deprived of the funds necessary to continue developing creative works.



Media Exhibition

Although the number of television channels has grown dramatically, media exhibition remains concentrated in the hands of a few companies. Rather than creating space for new competition, the media companies that own the broadcast networks have simply extended their control to cable. This result does not promote competition or real diversity. We analyzed ownership of the broadcast networks as well as the most widely distributed cable channels to assess the degree of concentration and control of television exhibition. What the analysis confirms is a marketplace largely controlled by a few media conglomerates, which own broadcast networks and numerous cable channels. Beginning with the ad-supported broadcast

networks, the table below highlights the control of broadcast television by the 5 major media conglomerates.

Broadcast Network	Owner	Status
ABC	Walt Disney Company	Affiliated
CBS	CBS Corporation	Affiliated
FOX	News Corporation	Affiliated
MyNetworkTV	News Corporation	Affiliated
NBC	Comcast/General Electric	Affiliated
The CW	Time Warner/CBS	Affiliated
Total Affiliated		100%

For our analysis of cable networks, we examined networks that had at least 50 million subscribers in 2010, according to SNL Kagan. The broadcast networks currently reach 115 million households which means that many of the cable networks included in this analysis do not present a meaningful increase to market competition due to their limited reach. Even with this broad definition, however, we find the market to be highly concentrated. Of the 85 cable networks that meet this threshold, 71 percent are affiliated with a media conglomerate. The majority of the affiliated cable networks are owned by a company that also owns a broadcast network. In the case of Viacom, because the company is ultimately controlled by National Amusements, the same company controlling CBS, its networks must also be included in this total. This analysis reveals that the cable market, ostensibly a source of increased competition, has itself become controlled by the same companies.

Cable Network	2010 Subscribers (millions)	Cable Network Owner	Status
TBS	101.0	Time Warner Inc.	Affiliated
TLC	100.9	Discovery Communications, Inc.	Unaffiliated
The Weather Channel	100.6	Comcast/General Electric/Other	Affiliated
Discovery Channel	100.5	Discovery Communications, Inc.	Unaffiliated
FOX News	100.4	News Corporation	Affiliated
TNT	100.4	Time Warner Inc.	Affiliated

Nickelodeon/Nick At Nite	100.3	Viacom Inc.	Affiliated
Food Network	100.2	Scripps/Tribune	Unaffiliated
A&E	100.1	Disney/Hearst/Comcast/General Electric	Affiliated
CNN/HLN	100.1	Time Warner Inc.	Affiliated
USA	100.0	Comcast/General Electric	Affiliated
ESPN/ESPN HD	99.8	Disney/Hearst	Affiliated
C-SPAN	99.7	C-SPAN	Unaffiliated
ESPN2	99.7	Disney/Hearst	Affiliated
Lifetime Television	99.7	Disney/Hearst/Comcast/General Electric	Affiliated
Spike TV	99.5	Viacom Inc.	Affiliated
HGTV	99.4	Scripps Networks Interactive, Inc.	Unaffiliated
Cartoon Network	99.3	Time Warner Inc.	Affiliated
MTV	99.2	Viacom Inc.	Affiliated
History	99.1	Disney/Hearst/Comcast/General Electric	Affiliated
Comedy Central	99.0	Viacom Inc.	Affiliated
Disney Channel	98.7	Walt Disney Company	Affiliated
VH1	98.7	Viacom Inc.	Affiliated
ABC Family Channel	98.5	Walt Disney Company	Affiliated
Syfy	98.5	Comcast/General Electric	Affiliated
CNBC	98.2	Comcast/General Electric	Affiliated
E! Entertainment Television	97.9	Comcast/General Electric	Affiliated
TV Land	97.8	Viacom Inc.	Affiliated
Animal Planet	97.1	Discovery Communications, Inc.	Unaffiliated
AMC	96.4	Cablevision Systems Corporation	Affiliated
FX Network	95.9	News Corporation	Affiliated
Travel Channel	95.6	Scripps/Cox Communications	Affiliated
MSNBC	95.2	Comcast/General Electric/Microsoft	Affiliated
Bravo	93.9	Comcast/General Electric	Affiliated
truTV	92.6	Time Warner Inc.	Affiliated
CMT	91.9	Viacom Inc.	Affiliated
BET	90.7	Viacom Inc.	Affiliated
Hallmark Channel	87.3	Crown Media Holdings, Inc.	Unaffiliated
Golf Channel	83.2	Comcast/General Electric	Affiliated
TCM	81.4	Time Warner Inc.	Affiliated
TV Guide Network	80.4	Lionsgate/JP Morgan Chase	Unaffiliated
Lifetime Movie Network	80.2	Disney/Hearst/Comcast/General Electric	Affiliated
MTV2	78.6	Viacom Inc.	Affiliated
Disney XD	77.9	Walt Disney Company	Affiliated

SPEED	77.3	News Corporation	Affiliated
Nick Jr.	76.9	Viacom Inc.	Affiliated
WE tv	76.8	Cablevision Systems Corporation	Affiliated
Oxygen Network	76.3	Comcast/General Electric	Affiliated
OWN: The Oprah Winfrey Network	75.4	Discovery Communications, Inc./Harpo	Unaffiliated
VERSUS	75.2	Comcast/General Electric	Affiliated
SOAPnet	75.1	Walt Disney Company	Affiliated
ESPNU	74.5	Disney/Hearst	Affiliated
GSN	73.5	DIRECTV/Sony	Affiliated
ESPNNews	73.4	Disney/Hearst	Affiliated
WGN America	72.7	Tribune Company	Unaffiliated
TeenNick	70.2	Viacom Inc.	Affiliated
Investigation Discovery	70.0	Discovery Communications, Inc.	Unaffiliated
Nat Geo WILD	69.9	News Corp./National Geographic Society	Affiliated
National Geographic Channel	69.9	News Corp./National Geographic Society	Affiliated
The Hub	69.1	Discovery Communications/Hasbro	Unaffiliated
The Style Network	68.2	Comcast/General Electric	Affiliated
BBC America	67.7	BBC Worldwide Ltd	Unaffiliated
Science Channel	67.2	Discovery Communications, Inc.	Unaffiliated
Bloomberg TV	66.1	Bloomberg LP	Unaffiliated
Current	62.8	Current Media, Inc.	Unaffiliated
Inspiration Network	62.5	Inspiration Ministries	Unaffiliated
Independent Film Channel	62.4	Cablevision Systems Corporation	Affiliated
Bio	62.3	Disney/Hearst/Comcast/General Electric	Affiliated
History International	61.5	Disney/Hearst/Comcast/General Electric	Affiliated
ReelzChannel	61.1	Hubbard Broadcasting, Inc.	Unaffiliated
FOX Business Network	60.3	News Corporation	Affiliated
GAC	59.3	Scripps Networks Interactive, Inc.	Unaffiliated
G4	59.2	Comcast/General Electric	Affiliated
Galavision	58.2	Univision Communications Inc.	Affiliated
Nicktoons Network	57.7	Viacom Inc.	Affiliated
Military Channel	57.4	Discovery Communications, Inc.	Unaffiliated
Cooking Channel	57.1	Scripps Networks Interactive, Inc.	Unaffiliated
FUSE	57.0	Madison Square Garden Company	Unaffiliated
VH1 Classic	57.0	Viacom Inc.	Affiliated
NFL Network	56.8	National Football League	Unaffiliated
Planet Green	55.9	Discovery Communications, Inc.	Unaffiliated

MLB Network	55.2	Cox/Comcast/MLB/DIRECTV/Time Warner Cable	Affiliated
NBA TV	54.0	NBA/Time Warner	Affiliated
DIY Network	53.7	Scripps Networks Interactive, Inc.	Unaffiliated
TV One	51.0	Radio One/Comcast/General Electric	Affiliated
Total Affiliated			71%

Media Distribution

The market for video programming delivery also lacks effective competition resulting from high levels of concentration. The four largest MVPDs in the U.S. provided service to 68 percent of all MVPD subscribers nationally in 2010, up from 50 percent in 2002.¹² A four-firm concentration ratio of 68 percent reveals that the market for MVPD services is an oligopoly, where these top firms unfairly profit from their ability to exercise their market power and increase prices. To reach a majority of consumers, broadcast networks must reach agreement with these four companies. Many local markets are also exceedingly concentrated. In the Comcast proceeding, Consumer Federation of America and other public interest groups noted, “While Comcast’s national market share is 25 percent, its share of individual markets is well over 50 percent in every market in which it provides service, and an upwards of 60 percent in other markets, including Boston, Philadelphia, and Chicago.”¹³

Concentration in the MVPD market helps explain why cable prices continue to rise faster than the consumer price index (CPI). The lack of effective competition allows the oligopoly firms to raise prices above that of a competitive market and maximize profit at the expense of

¹² Jeffery Eisenach, “The Economics of Retransmission Consent,” National Association of Broadcasters, March 2009, p.1, Available from National Association of Broadcasters, <http://www.nab.org/documents/resources/050809EconofRetransConsentEmpiris.pdf>, accessed May 17, 2011. SNL Kagan, “U.S. Multichannel Industry Benchmarks,” and “U.S. Cable Subscriber Highlights,” Available from SNL Kagan, <http://www.snl.com>, accessed May 23, 2011.

¹³ Consumer Federation of America *et al.* “Joint Position to Deny of Consumer Federation of America, Consumers Union, Free Press and Media Access Project,” In the Matter of Applications for Consent to the Transfer and Control of Licenses from General Electric Company to Comcast Corporation, MB Docket No 10-56, June 21, 2010, p. 15.

consumers. The FCC's most recent Cable Industry Price Report found that average monthly price for expanded basic cable in 2008 increased 5.9 percent over the previous year, to an average of \$52.37. The increase in the CPI in the same period was just 0.1 percent.¹⁴ The rising cost of basic cable services is a symptom of the decline of competition among cable providers.

Mergers Compound These Problems

As the previous section illustrated, the market for the delivery of video programming is already concentrated to an alarming degree. The FNOI asks about "trends in horizontal mergers and acquisitions" and how mergers like that of Comcast and NBC Universal might impact the exercise of market power by MVPDs.¹⁵ We in turn ask the FCC under what economic theory they *do not* see an a priori problem with such concentration? The approval of the merger between Comcast-NBCU has only served to heighten concentration and decrease competition in the market for video delivery through both vertical and horizontal integration. WGAW is on the record regarding our opposition to the Comcast-NBCU merger without meaningful conditions, viewing the inordinate power a merged Comcast-NBCU could wield in both the production and distribution markets a serious threat to genuinely independent production.¹⁶

As a condition of merger approval, the FCC required Comcast-NBCU to,

¹⁴ Federal Communications Commission, "Annual Report on Cable Industry Prices," February 14, 2011, p. 2, Available from FCC website, MM Docket No. 92-266, http://hraunfoss.fcc.gov/edocs_public/attachmatch/DA-11-284A1.pdf.

¹⁵ Federal Communications Commission, "Further Notice of Inquiry," Annual Assessment of the Status of Competition in the Market for the Delivery of Video Programming, April 21, 2011, From FCC website, MB Docket No. 07-269, http://transition.fcc.gov/Daily_Releases/Daily_Business/2011/db0421/FCC-11-65A1.pdf, p. 16.

¹⁶ Writers Guild of America, West, "Comments of the Writers Guild of America, West," In the Matter of Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc., for Consent to Assign Licenses or Transfer Control of Licenses, MB Docket No. 10-56, June 21, 2010; Writers Guild of America, West. "Reply Comments of the Writers Guild of America, West," In the Matter of Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc., for Consent to Assign Licenses or Transfer Control of Licenses, MB Docket No. 10-56, July 21, 2010; Writers Guild of America, West. "Reply Comments of the Writers Guild of America, West," In the Matter of Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc., for Consent to Assign Licenses or Transfer Control of Licenses, MB Docket No. 10-56, August 19, 2010.

“file quarterly reports in a uniform format with the Commission containing the following information for the previous three months: the total number of hours of independent programming aired by each broadcast O&O and each owned or controlled programming network, the title of each program, the date(s) and time(s) the program was aired, the length of the program, a short description of the program...”¹⁷

The first of these reports, filed on April 11, 2011, covers the first quarter of 2011 and highlights the constriction in the market for the delivery of video programming. Of the six primetime series that aired on NBC in the first quarter of 2011 classified by Comcast-NBCU as independent, three were actually produced by Warner Bros. As the studio arm of Time Warner, a company that part-owns the CW and numerous cable channels, Warner Bros. is not an independent producer. Genuinely independent productions must come from sources that are not affiliated with a broadcast or cable outlet. Producers such as Warner Bros. have a guaranteed outlet for television exhibition in the broadcast and cable networks owned by the parent company. Of the primetime series reported for NBC, only three meet a definitional standard of genuine independence.¹⁸ Those series constituted a total of 23 primetime programming hours, which equals only 10.5% of total primetime hours for the quarter (here, January 18-March 31). However, it is worth noting that the three independently produced series were all reality programs, which the networks have made a strategic business decision not to own.

The recent announcement of AT&T’s intent to purchase T-Mobile in a horizontal merger presents a different but related set of market concentration issues. Rather than the Comcast-NBCU model of possessing all the elements in a production chain, the AT&T-T-Mobile merger will represent immense horizontal concentration across a single industry. WGAW forecasted the reduction in competition in our reply comments opposing the Comcast-NBCU merger, arguing

¹⁷ Federal Communications Commission, “Memorandum Opinion and Order,” In the Matter of Applications of Comcast Corporation, General Electric Company, and NBC Universal, Inc. January 20, 2011. Appendix A § X.5.

¹⁸ Independently produced series were “Who Do You Think You Are?,” “The Celebrity Apprentice,” and “America’s Next Great Restaurant.”

that “another wave of mergers” would occur.¹⁹ The FCC’s approval of a merger on the scale of Comcast-NBCU served as a clear signal to other large firms that extreme media concentration is acceptable. The core of our concern with the pending AT&T-T-Mobile merger is that a competitive market for mobile video distribution will be crushed just as it is beginning to emerge. The WGAW has joined with Media Access Project, Center for Media Justice, Consumers Union and New America Foundation to petition the FCC to deny this proposed merger.

FCC Must Take Action to Promote Competition and Diversity

Given the concentrated nature of the television marketplace outlined in this filing, the FCC must institute specific remedies to promote a diverse and competitive marketplace for content production, exhibition and distribution. Requirements such as minimum levels of independently produced content on broadcast networks, continued protection of broadcast television through retransmission consent, promotion of content diversity through an AllVid adapter device and further protection of the nascent online video market are necessary steps to improve the current media marketplace.

Institute Minimum Requirements for Genuinely Independent Programming

As the WGAW and other industry groups have proposed during past FCC proceedings, we strongly believe the FCC should institute a requirement that the broadcast networks devote not less than 25 percent of their primetime schedule to programming that is owned and produced by independent sources. Such a requirement would represent meaningful promotion of a competitive media marketplace. Independent producers should be defined as studios or production companies that are not owned or affiliated with a major broadcast or cable network or

¹⁹ Writers Guild of America, West, “Reply Comments of the Writers Guild of America, West,” In the Matter of Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc., for Consent to Assign Licenses or Transfer Control of Licenses, MB Docket No. 10-56, August 19, 2010.

an MVPD provider. The requirement should apply to each programming category, including scripted programming. The requirement must be met with the programming of original series produced specifically for the network and not with films or television series that have previously been exhibited in another market or platform.

Expand the Definition of Content Creators

The FCC must expand its definition of “content creators” beyond “creators of video programming including major studios that are subsidiaries of entertainment conglomerates and independent production companies.”²⁰ This definition, while intended to allow for cleaner economic analysis, fails to take into account the *actual* creators of content – many of whom are WGAW members. As such, the FCC should include in the definition those who actually create the content, specifically writers. The emphasis of this definition should be placed on the talent responsible for such creative works, rather than the entities that finance the product. The content “created” by studios and production companies is not possible without a writer first putting pen to paper. To discount the role of individual writers and creators in the process, even if they are factored in to firm level analysis, is to begin the discussion of content creation on a false premise.

Protect the Balance of Power in Retransmission Consent Negotiations

The FNOI seeks comment on a variety of regulations affecting entry and rivalry in the market for the delivery of video programming.²¹ The WGAW believes that the rules currently in place to balance power in retransmission consent negotiations are an especially vital tool to

²⁰ Federal Communications Commission, “Further Notice of Inquiry,” Annual Assessment of the Status of Competition in the Market for the Delivery of Video Programming, April 21, 2011, From FCC website, MB Docket No. 07-269, http://transition.fcc.gov/Daily_Releases/Daily_Business/2011/db0421/FCC-11-65A1.pdf, p. 25.

²¹ Federal Communications Commission, “Further Notice of Inquiry,” Annual Assessment of the Status of Competition in the Market for the Delivery of Video Programming, April 21, 2011, From FCC website, MB Docket No. 07-269, http://transition.fcc.gov/Daily_Releases/Daily_Business/2011/db0421/FCC-11-65A1.pdf, p. 13.

address MVPD market power. MVPDs derive significant value from the ability to charge consumers for access to the broadcast networks to view WGA members' creative works. The few instances of signal loss in retransmission consent negotiations are used by MVPDs to convince the FCC to weaken retransmission consent rules in a way that increases their market power in retransmission negotiations. To wit, one study found consumers were "about 10 times as likely to experience a complete cable system outage, and about 24 times as likely to experience an electricity outage, [as they are] to be deprived of [their] first-choice television channel because of a retransmission consent dispute."²²

To reach the public, broadcast networks and their affiliate stations must rely on an increasingly concentrated MVPD market, making a strong, protective retransmission consent regime more necessary than ever. The few contests highlighted in the press demonstrate that the retransmission negotiation system is working as envisioned, and that broadcast stations have the protection needed to negotiate against powerful MVPDs. Empowering broadcast stations to negotiate for retransmission revenue to fund local and national programming helps the FCC realize its mandate to foster diversity, localism and competition in media. To weaken the rules would undermine these important objectives.

Mandate an AllVid Adapter Device

On April 21st, 2010, the Federal Communications Commission (FCC) released a Notice of Inquiry (NOI) seeking comment on specific steps that could be taken to "unleash competition in the retail market for smart, set-top video devices ("smart video devices"²³) that are compatible

²² Jeffery Eisenach, "The Economics of Retransmission Consent," National Association of Broadcasters, March 2009, p.1, Available from National Association of Broadcasters, <http://www.nab.org/documents/resources/050809EconofRetransConsentEmpiris.pdf>, accessed May 17, 2011.

²³ As used by the FCC, the term "smart video device" refers to a product that is capable of navigating the universe of video content available to a viewer including cable or satellite set-top boxes, video game systems, digital video recorders, and home theater personal computers.

with all multichannel video programming distributor (“MVPD”) services.”²⁴ The WGAW supports the FCC’s efforts to promote competition and innovation in set-top box delivery of video content to U.S. households and views the AllVid effort as an integral part in that process. Content creators will benefit from the increased ability to deliver independent and diverse content to the television screen enabled by a robust set-top box market. The WGAW has documented how media consolidation has limited the independent and diverse stories broadcast on traditional platforms. Set-top boxes that integrate content from multiple sources would increase the diverse content available for viewing on the television set and provide meaningful competition to the concentrated markets of broadcast and cable television. The WGAW supported The FCC’s Net Neutrality rulemaking because a free and open Internet offers an opportunity for independent producers, including WGAW members, to compete with the major media companies on the basis of content quality. Unleashing competition in the set-top box market and allowing consumers to access both MVPD and Internet-delivered independent content on the same screen is a natural extension of our support for Net Neutrality.

Protect the Nascent Online Video Market

The online video market represents a genuine opportunity to reintroduce independent content to consumers. The FCC has recognized the promise of this market, taking action to protect it via its proceedings on “Preserving the Open Internet”²⁵ and “Broadband Industry Practices”²⁶ and its subsequent order in December 2010 preserving the concept of net

²⁴ Federal Communications Commission, “Notice of Inquiry,” In the Matter of Video Device Competition, Implementation of Section 304 of the Telecommunications Act of 1996, Commercial availability of navigation devices, and Compatibility between cable systems and consumer electronics equipment, MB Docket No. 10-91. April 21, 2010. p.1.

²⁵ GN Docket 09-191

²⁶ WC Docket 07-52

neutrality.²⁷ The WGAW had hoped the FCC would take bolder steps in their support for net neutrality, but the fact the FCC opted to take steps at all shows the importance of the online marketplace. As is the case with any market where rapid technological development is commonplace, provisions enacted to ensure a delicate balance between parties are sometimes unable to predict every anti-competitive strategy. The recent move by AT&T to cap the amount of data a customer can use per month, a practice also in use by MVPDs Comcast and Charter Communications, is of great concern to the WGAW.²⁸ The caps range from a maximum of 150 gigabytes (non-UVerse AT&T Internet subscribers) to 250 gigabytes (Comcast Internet subscribers), which translates into roughly 13 high definition films per month.²⁹ According to Nielsen, the average American watches 34 hours of TV programming per week, which would place the average American on the wrong side of these bandwidth caps.³⁰ Furthermore, AT&T customers who exceed their caps are charged an additional fee; Comcast customers who go over their limit twice in six months lose their Comcast Internet service.

This blatantly anti-competitive behavior is designed to impede the growth of the online video market to sustain the traditional cable subscription market. The FCC should require ISPs to report on their bandwidth capping and management practices, with special attention placed on those firms integrated with a cable provider. Once these reports are collected and made available for public review, the FCC should open a Proceeding on bandwidth capping and management.

²⁷ Federal Communications Commission, "Report and Order" In the Matter of Preserving the Open Internet, Broadband Industry Practices, December 23, 2010, From FCC Website at http://transition.fcc.gov/Daily_Releases/Daily_Business/2010/db1223/FCC-10-201A1.pdf, accessed June 1, 2011.

²⁸ Joshua L. Weinstein, "Cable Giants Seek to Limit Internet Streaming, Slow Netflix." *The Wrap*, May 30, 2011, available at <http://www.thewrap.com/media/article/data-caps-threaten-streaming-video-27576>, accessed June 1, 2011.

²⁹ *Ibid.*

³⁰ Brian Stelter, "TV Viewing Continues to Edge Up," *The New York Times*, January 2, 2011, available at http://www.nytimes.com/2011/01/03/business/media/03ratings.html?_r=1&src=tw&tw=nytimes, accessed May 30, 2011.

Prohibit Further Media Consolidation

It is evident that the media marketplace needs to be more competitive, not less. Consumers deserve access to more diverse content, not less. Content creators deserve a market where competition for their product allows them to capture the economic value which matches their contribution to the final product. Any mergers, whether they are primarily horizontal or vertical, will only serve to exacerbate the detrimental trends currently in place. The FCC must scrutinize any proposed media mergers that reduce the number of competitive firms at any stage of the production chain and meet its public interest obligations to protect diversity and competition by acting decisively to prohibit further media consolidation.

Conclusion

A truly competitive market for video programming delivery must be competitive at all levels of the value chain, from production through distribution. Such competition ensures that a maximum number of voices are heard. Requirements to reintroduce independently produced programming on television and promote the growth of a vibrant and competitive online market for video content, as proposed in this filing, would represent meaningful movement towards a more healthy media marketplace. This would result in competition for both writers' services and viewers' attention, incentivizing the market to innovate and improve the quality and diversity of the content offered to consumers. The FCC has a clear mandate to promote competition in the media marketplace and we urge the FCC to act within that mandate to institute meaningful remedies to ameliorate the detrimental effects of the current level of market concentration.

Appendix

I. Broadcast Primetime Fall Series (1989, 1999, 2008, 2009, 2010)

Series Title	Year	Network	Studio/Producer	Independently Produced?
20/20	1989	ABC	ABC News	No
ABC Saturday Mystery	1989	ABC	Universal	No
Anything But Love	1989	ABC	Fox	No
Chicken Soup	1989	ABC	Carsey-Werner	Yes
China Beach	1989	ABC	Warner Bros	No
Doogie Howser, M.D.	1989	ABC	Steven Bochco Prods Inc	Yes
Family Matters	1989	ABC	Warner Bros	No
Free Spirit	1989	ABC	Columbia/Tristar	Yes
Full House	1989	ABC	Warner Bros	Yes
Growing Pains	1989	ABC	Warner Bros	Yes
Head of the Class	1989	ABC	Warner Bros	Yes
Homeroom	1989	ABC	Columbia/Tristar	Yes
Just the Ten of Us	1989	ABC	Warner Bros	Yes
Life Goes On	1989	ABC	Warner Bros	Yes
Living Dolls	1989	ABC	Columbia/Tristar	Yes
MacGyver	1989	ABC	Paramount	Yes
Mission: Impossible	1989	ABC	Paramount	Yes
Monday Night Football	1989	ABC	ABC Sports	No
Mr. Belvedere	1989	ABC	Fox	No
Perfect Strangers	1989	ABC	Lorimar/Warner Bros	Yes
Primetime Live	1989	ABC	ABC News	No
Roseanne	1989	ABC	Carsey-Werner	Yes
thirtysomething	1989	ABC	MGM	Yes
Who's the Boss?	1989	ABC	Columbia/Tristar	Yes
Wonder Years, The	1989	ABC	New World Television	Yes
Young Riders	1989	ABC	MGM	Yes
48 Hours	1989	CBS	CBS News	No
60 Minutes	1989	CBS	CBS News	No
Dallas	1989	CBS	Lorimar/Warner Bros	Yes

Designing Women	1989	CBS	Columbia/Tristar	Yes
Falcon Crest	1989	CBS	Lorimar/Warner Bros	Yes
Famous Teddy Z	1989	CBS	Columbia/Tristar	Yes
Island Son	1989	CBS	Lorimar/Warner Bros	Yes
Jake and the Fatman	1989	CBS	Paramount	Yes
Knots Landing	1989	CBS	Lorimar/Warner Bros	Yes
Major Dad	1989	CBS	Universal	Yes
Murder, She Wrote	1989	CBS	Universal	Yes
Murphy Brown	1989	CBS	Warner Bros	Yes
Newhart	1989	CBS	MTM Productions	Yes
Paradise	1989	CBS	Warner Bros	Yes
Peaceable Kingdom	1989	CBS	Columbia/Tristar	Yes
People Next Door, The	1989	CBS	Lorimar/Warner Bros	Yes
Rescue 911	1989	CBS	Katy Films Productions	Yes
Saturday Night with Connie Chung	1989	CBS	CBS News	No
Snoops	1989	CBS	Paramount	Yes
Top of the Hill	1989	CBS	Stephen J Cannell Prod	Yes
Tour of Duty	1989	CBS	Columbia/Tristar	Yes
Wiseguy	1989	CBS	Stephen J Cannell Prod	Yes
Wolf	1989	CBS	CBS	No
21 Jump Street	1989	Fox	Stephen J Cannell	Yes
Alien Nation	1989	Fox	Fox	No
America's Most Wanted	1989	Fox	Fox	No
Beyond Tomorrow	1989	Fox	Beyond Productions	Yes
Booker	1989	Fox	Stephen J Cannell	Yes
Cops	1989	Fox	Fox	No
It's Garry Shandling's Show	1989	Fox	Stephen Banks	Yes
Married With Children	1989	Fox	Columbia/Tristar	Yes
Open House	1989	Fox	Paramount	Yes
Reporters, The	1989	Fox	Fox	No
Totally Hidden Video	1989	Fox	Fox	No
Tracey Ullman	1989	Fox	Fox	No

Show				
227	1989	NBC	Columbia/Tristar	Yes
A Different World	1989	NBC	Carsey-Werner	Yes
Alf	1989	NBC	Alien Productions	Yes
Amen	1989	NBC	Carson Productions Group	Yes
Baywatch	1989	NBC	Baywatch Prods	Yes
Cheers	1989	NBC	Paramount	Yes
Cosby Show	1989	NBC	Carsey-Werner	Yes
Dear John	1989	NBC	Paramount	Yes
Empty Nest	1989	NBC	Disney	Yes
Golden Girls	1989	NBC	Disney	Yes
Hardball	1989	NBC	Pitch Me One Productions Inc	Yes
Hogan Family	1989	NBC	Lorimar/Warner Bros	Yes
Hunter	1989	NBC	Stephen J Cannell Prod	Yes
In the Heat of the Night	1989	NBC	MGM	Yes
L.A. Law	1989	NBC	Fox	No
Magical World of Disney	1989	NBC	Disney	Yes
Mancuso, F.B.I.	1989	NBC	Joe Hamilton Prods Inc	Yes
Matlock	1989	NBC	Paramount	Yes
Midnight Caller	1989	NBC	Lorimar/Warner Bros	Yes
My Two Dads	1989	NBC	Columbia/Tristar	Yes
Night Court	1989	NBC	Warner Bros	Yes
Nutt House	1989	NBC	Touchstone	No
Quantum Leap	1989	NBC	Universal	Yes
Sister Kate	1989	NBC	Fox	No
Unsolved Mysteries	1989	NBC	Cosgrove/Meurer Prods Inc	Yes
20/20				
Downtown	1999	ABC	ABC News	No
20/20 Friday	1999	ABC	ABC News	No
20/20 Monday	1999	ABC	ABC News	No
20/20 Wednesday	1999	ABC	ABC News	No
Boy Meets World	1999	ABC	Touchstone	No
Dharma & Greg	1999	ABC	Fox	No
Drew Carey Show, The	1999	ABC	Warner Bros	No
Hughleys, The	1999	ABC	Greenblatt Janollari Studio	Yes

It's Like, You Know...	1999	ABC	DW Dramatic Television	Yes
Monday Night Football	1999	ABC	ABC Sports	No
Norm	1999	ABC	Warner Bros	No
Odd Man Out	1999	ABC	Warner Bros	No
Oh Grow Up	1999	ABC	Greenblatt Janollari Studio	Yes
Once and Again	1999	ABC	ABC/Disney	No
Practice, The	1999	ABC	Fox	No
Sabrina, the Teenage Witch	1999	ABC	Paramount	No
Snoops	1999	ABC	Fox	No
Spin City	1999	ABC	DW Television LLC	Yes
Sports Night	1999	ABC	Touchstone	No
TV's Bloopers & Practical Jokes	1999	ABC	Dick Clark Film Group	Yes
Two Guys and a Girl	1999	ABC	Fox	No
Whose Line Is It Anyway?	1999	ABC	Warner Bros	No
Wonderful World of Disney	1999	ABC	Disney	No
48 Hours	1999	CBS	CBS News	No
60 Minutes	1999	CBS	CBS News	No
60 Minutes II	1999	CBS	CBS News	No
Becker	1999	CBS	Paramount	No
Chicago Hope	1999	CBS	Fox	No
Cosby	1999	CBS	Carsey-Werner	Yes
Diagnosis Murder	1999	CBS	Paramount	No
Early Edition	1999	CBS	CBS	No
Everybody Loves Raymond	1999	CBS	HBO	No
Family Law	1999	CBS	Columbia/Tristar	Yes
JAG	1999	CBS	Paramount	No
Judging Amy	1999	CBS	Fox	No
Kids Say the Darndest Things	1999	CBS	LMNO Productions Inc	Yes
King of Queens, The	1999	CBS	Columbia TriStar	Yes
Ladies Man,	1999	CBS	Paramount	No

The				
Love & Money	1999	CBS	Paramount	No
Martial Law	1999	CBS	CBS	No
Nash Bridges	1999	CBS	Rysher Productions Inc	Yes
Now and Again	1999	CBS	Paramount	No
Touched by an Angel	1999	CBS	CBS	No
Walker, Texas Ranger	1999	CBS	Columbia/Tristar	Yes
Work With Me	1999	CBS	CBS Productions	No
Action	1999	Fox	Columbia/Tristar	Yes
Ally	1999	Fox	Fox	No
Ally McBeal	1999	Fox	Fox	No
America's Most Wanted	1999	Fox	Fox	No
Beverly Hills, 90210	1999	Fox	Fox	No
Cops	1999	Fox	Fox	No
Family Guy	1999	Fox	Fox	No
Futurama	1999	Fox	Fox	No
Get Real	1999	Fox	Fox	No
Harsh Realm	1999	Fox	Fox	No
King of the Hill	1999	Fox	Fox	No
Party of Five	1999	Fox	Columbia/Tristar	Yes
Ryan Caulfield: Year One	1999	Fox	Regency Television Productions, Inc	Yes
Simpsons, The	1999	Fox	Fox	No
That '70s Show	1999	Fox	Carsey-Werner	Yes
Time of Your Life	1999	Fox	Columbia/Tristar	Yes
World's Funniest!	1999	Fox	Brad Lachman Prods Inc	Yes
World's Wildest Police Videos	1999	Fox	Earl Greenburg Productions/Paul Stojanovich Productions	Yes
X-Files, The	1999	Fox	Fox	No
3rd Rock from the Sun	1999	NBC	Carsey-Werner	Yes
Cold Feet	1999	NBC	NBC Enterprises	No
Dateline Friday	1999	NBC	NBC News	No
Dateline Monday	1999	NBC	NBC News	No
Dateline	1999	NBC	NBC News	No

Sunday				
Dateline Tuesday	1999	NBC	NBC News	No
Dateline Wednesday	1999	NBC	NBC News	No
ER	1999	NBC	Warner Bros	No
Frasier	1999	NBC	Paramount	No
Freaks and Geeks	1999	NBC	DW SKG TV LLC	Yes
Friends	1999	NBC	Warner Bros	No
Jesse	1999	NBC	MGM	Yes
Just Shoot Me	1999	NBC	Columbia/Tristar	Yes
Law & Order	1999	NBC	Universal	Yes
Law & Order: Special Victims Unit	1999	NBC	Universal	Yes
Mike O'Malley Show, The	1999	NBC	NBC Studios	No
Pretender, The	1999	NBC	Fox	No
Profiler	1999	NBC	Universal	Yes
Providence	1999	NBC	Universal	Yes
Stark Raving Mad	1999	NBC	Fox	No
Suddenly Susan	1999	NBC	Warner Bros	No
Third Watch	1999	NBC	Warner Bros	No
Veronica's Closet	1999	NBC	Warner Bros	No
West Wing, The	1999	NBC	Warner Bros	No
Will & Grace	1999	NBC	NBC	No
Dilbert	1999	UPN	Fox	No
Grown Ups	1999	UPN	Columbia/Tristar	Yes
Malcolm & Eddie	1999	UPN	MGM	Yes
Moesha	1999	UPN	Paramount	No
Parkers, The	1999	UPN	Paramount	No
Seven Days	1999	UPN	Four Star International, Inc	Yes
Shasta McNasty	1999	UPN	Columbia/Tristar	Yes
Star Trek: Voyager	1999	UPN	Paramount	No
Strip, The	1999	UPN	Warner Bros	No
WWF Smackdown!	1999	UPN	World Wrestling Federation	Yes
7th Heaven	1999	WB	Spelling Television	No

7th Heaven: Beginnings	1999	WB	Spelling Television	No
Angel	1999	WB	Fox	No
Buffy, the Vampire Slayer	1999	WB	Fox	No
Charmed	1999	WB	Spelling Television	No
Dawson's Creek	1999	WB	Columbia/Tristar	Yes
Felicity	1999	WB	Touchstone	No
For Your Love	1999	WB	Warner Bros	No
Jack & Jill	1999	WB	Warner Bros	No
Jamie Foxx Show, The	1999	WB	Warner Bros	No
Mission Hill	1999	WB	Warner Bros	No
Popular	1999	WB	Touchstone	No
Roswell	1999	WB	Fox	No
Safe Harbor	1999	WB	Spelling Television	No
Steve Harvey Show, The	1999	WB	Warner Bros	No
20/20	2008	ABC	ABC News	No
ABC College Football	2008	ABC	ABC Sports	No
America's Funniest Home Videos	2008	ABC	Vin Di Bona	yes
Boston Legal	2008	ABC	Fox	No
Brothers & Sisters	2008	ABC	ABC Studios	No
Dancing With the Stars	2008	ABC	BBC Worldwide Prods	Yes
Desperate Housewives	2008	ABC	ABC Studios	No
Dirty Sexy Money	2008	ABC	ABC Studios	No
Eli Stone	2008	ABC	ABC Studios	No
Extreme Makeover: Home Edition	2008	ABC	Endemol	Yes
Grey's Anatomy	2008	ABC	ABC Studios	No
Life on Mars	2008	ABC	Fox	No
Opportunity Knocks	2008	ABC	Eyeworks 3 Ball	Yes
Private Practice	2008	ABC	ABC Studios	No
Pushing Daisies	2008	ABC	Warner Bros	No
Supernanny	2008	ABC	Richochet, Ltd.	Yes

Ugly Betty	2008	ABC	ABC Studios	No
Wife Swap	2008	ABC	RDF USA Prods	Yes
48 Hours Mystery	2008	CBS	CBS News	No
60 Minutes	2008	CBS	CBS News	No
Amazing Race, The	2008	CBS	CBS Productions	No
Big Bang Theory, The	2008	CBS	Warner Bros	No
Cold Case	2008	CBS	Warner Bros	No
Criminal Minds	2008	CBS	ABC Studios	No
CSI: Crime Scene Investigation	2008	CBS	CBS	No
CSI: Miami	2008	CBS	CBS	No
CSI: New York	2008	CBS	CBS	No
Eleventh Hour	2008	CBS	Warner Bros	No
Ex List, The	2008	CBS	Fox	No
Gary Unmarried	2008	CBS	ABC Studios	No
Ghost Whisperer, The	2008	CBS	ABC Studios	No
How I Met Your Mother	2008	CBS	Fox	No
Mentalist, The	2008	CBS	Warner Bros	No
NCIS	2008	CBS	CBS Television Studios	No
New Adventures of Old Christine, The	2008	CBS	Warner Bros	No
Numb3rs	2008	CBS	CBS Television Studios	No
Survivor: Gabon	2008	CBS	Mark Burnett Productions	Yes
Two and a Half Men	2008	CBS	Warner Bros	No
Unit, The	2008	CBS	Fox	No
Without a Trace	2008	CBS	Warner Bros	No
Worst Week	2008	CBS	NBC Studios	No
90210	2008	CW	CBS Productions	No
America's Next Top Model	2008	CW	10 by 10 Entertainment	Yes
Easy Money	2008	CW	Media Rights Capital	Yes
Everybody Hates Chris	2008	CW	CBS Television Studios	No
Game, The	2008	CW	CBS Television Studios	No

Gossip Girl	2008	CW	Warner Bros	No
In Harm's Way	2008	CW	Media Rights Capital	Yes
One Tree Hill	2008	CW	Warner Bros	No
Privileged	2008	CW	Warner Bros	No
Smallville	2008	CW	Warner Bros	No
Stylista	2008	CW	Warner Horizon (Warner Bros)	No
Supernatural	2008	CW	Warner Bros	No
Surviving Suburbia	2008	CW	Surviving Suburbia, LLC	Yes
Valentine	2008	CW	Valentine's Day Prods LLC	Yes
American Dad	2008	Fox	Fox	No
America's Most Wanted	2008	Fox	Fox	No
Are You Smarter Than a 5th Grader?	2008	Fox	Are You Smarter Productions	Yes
Bones	2008	Fox	Fox	No
Cops	2008	Fox	Fox	No
Do Not Disturb	2008	Fox	Fox	No
Don't Forget the Lyrics	2008	Fox	RDF USA	Yes
Family Guy	2008	Fox	Fox	No
Fringe	2008	Fox	Warner Bros	No
House	2008	Fox	Universal	No
King of the Hill	2008	Fox	Fox	No
Kitchen Nightmares	2008	Fox	ITV Studios in association with A Smith & Co. Prods	Yes
Moment of Truth, The	2008	Fox	Lighthearted Entertainment	Yes
Prison Break	2008	Fox	Fox	No
Simpson's, The	2008	Fox	Fox	No
Terminator: The Sarah Connor Chronicles	2008	Fox	Warner Bros	No
Til Death	2008	Fox	Sony	Yes
30 Rock	2008	NBC	NBC/Universal	No
America's Toughest Jobs	2008	NBC	Original Productions	Yes
Biggest Loser, The	2008	NBC	Reveille	Yes
Chuck	2008	NBC	Warner Bros	No
Dateline NBC	2008	NBC	NBC News	No
Deal or No Deal	2008	NBC	Endemol	Yes

ER	2008	NBC	Warner Bros	No
Football Night in America	2008	NBC	NBC Sports	No
Heroes	2008	NBC	NBC Studios	No
Kath & Kim	2008	NBC	NBC Studios	No
Knight Rider	2008	NBC	NBC Studios	No
Law & Order: SVU	2008	NBC	NBC Universal	No
Life	2008	NBC	NBC Studios	No
Lipstick Jungle	2008	NBC	NBC Universal	No
My Name is Earl	2008	NBC	Fox	No
My Own Worst Enemy	2008	NBC	NBC Studios	No
Office, The	2008	NBC	NBC Universal	No
Sunday Night Football	2008	NBC	NBC Sports	No
20/20	2009	ABC	ABC News	No
America's Funniest Home Videos	2009	ABC	Vin Di Bona	Yes
Brothers & Sisters	2009	ABC	ABC Studios	No
Castle	2009	ABC	ABC Studios	No
Cougar Town	2009	ABC	ABC Studios	No
Dancing With the Stars	2009	ABC	BBC Worldwide Prods	Yes
Desperate Housewives	2009	ABC	ABC Studios	No
Eastwick	2009	ABC	Warner Bros	No
Extreme Makeover: Home Edition	2009	ABC	Endemol	Yes
Flash Forward	2009	ABC	ABC Studios	No
Forgotten, The	2009	ABC	Warner Bros	No
Grey's Anatomy	2009	ABC	ABC Studios	No
Hank	2009	ABC	Warner Bros	No
Middle, The	2009	ABC	Warner Bros	No
Modern Family	2009	ABC	Fox	No
Private Practice	2009	ABC	ABC Studios	No
Saturday Night College Football	2009	ABC	ABC Sports	No
Shark Tank	2009	ABC	Mark Burnett Prods/Sony	Yes
Supernanny	2009	ABC	Richochet, Ltd.	Yes

Ugly Betty	2009	ABC	ABC Studios	No
48 Hours Mystery	2009	CBS	CBS News	No
60 Minutes	2009	CBS	CBS News	No
Accidentally on Purpose	2009	CBS	CBS Productions	No
Amazing Race, The	2009	CBS	CBS Productions	No
Big Bang Theory, The	2009	CBS	Warner Bros	No
Cold Case	2009	CBS	Warner Bros	No
Criminal Minds	2009	CBS	ABC Studios	No
CSI: Crime Scene Investigation	2009	CBS	CBS	No
CSI: Miami	2009	CBS	CBS	No
CSI: New York	2009	CBS	CBS	No
Gary Unmarried	2009	CBS	ABC Studios	No
Ghost Whisperer, The	2009	CBS	ABC Studios	No
Good Wife, The	2009	CBS	CBS Productions	No
How I Met Your Mother	2009	CBS	Fox	No
Medium	2009	CBS	CBS	No
Mentalist, The	2009	CBS	Warner Bros	No
NCIS	2009	CBS	CBS Television Studios	No
NCIS: Los Angeles	2009	CBS	CBS Television Studios	No
New Adventures of Old Christine, The	2009	CBS	Warner Bros	No
Numb3rs	2009	CBS	CBS Television Studios	No
Survivor	2009	CBS	Mark Burnett Productions	Yes
Three Rivers	2009	CBS	CBS Productions	No
Two and a Half Men	2009	CBS	Warner Bros	No
90210	2009	CW	CBS Productions	No
America's Next Top Model	2009	CW	10 by 10 Entertainment	Yes
Beautiful Life, The	2009	CW	CBS Paramount	No
Gossip Girl	2009	CW	Warner Bros	No
Melrose Place	2009	CW	CBS Paramount	No

One Tree Hill	2009	CW	Warner Bros	No
Smallville	2009	CW	Warner Bros	No
Supernatural	2009	CW	Warner Bros	No
Vampire Diaries, The	2009	CW	CBS/Warner Bros	No
American Dad	2009	Fox	Fox	No
America's Most Wanted	2009	Fox	Fox	No
Bones	2009	Fox	Fox	No
Brothers	2009	Fox	Sony Pictures Television	Yes
Cleveland Show, The	2009	Fox	Fox	No
Cops	2009	Fox	Fox	No
Dollhouse	2009	Fox	Fox	No
Family Guy	2009	Fox	Fox	No
Fringe	2009	Fox	Warner Bros	No
Glee	2009	Fox	Fox	No
House	2009	Fox	Universal	No
Lie to Me	2009	Fox	Fox	No
Simpsons, The	2009	Fox	Fox	No
So You Think You Can Dance	2009	Fox	19 Entertainment	Yes
Til Death	2009	Fox	Sony	Yes
30 Rock	2009	NBC	NBC Universal	No
Biggest Loser, The	2009	NBC	Shine International	Yes
Community	2009	NBC	Krasnoff Foster Prods/Sony Pictures Television	Yes
Dateline NBC	2009	NBC	NBC News	No
Football Night in America	2009	NBC	NBC Sports	No
Heroes	2009	NBC	NBC Studios	No
Jay Leno Show, The	2009	NBC	NBC Universal	No
Law & Order	2009	NBC	NBC Universal	No
Law & Order: Special Victims Unit	2009	NBC	NBC Universal	No
Mercy	2009	NBC	NBC Universal	No
NBC Sunday Night Football	2009	NBC	NBC Sports	No
Office, The	2009	NBC	NBC Universal	No
Parks and Recreation	2009	NBC	NBC Universal	No

SNL Weekend Update Thursday	2009	NBC	NBC Universal	No
Southland	2009	NBC	Warner Bros	No
Trauma	2009	NBC	NBC Universal	No
20/20	2010	ABC	ABC News	No
America's Funniest Home Videos	2010	ABC	Vin Di Bona	Yes
Better With You	2010	ABC	Warner Bros	No
Body of Proof	2010	ABC	ABC Studios	No
Brothers & Sisters	2010	ABC	ABC Studios	No
Castle	2010	ABC	ABC Studios	No
Cougar Town	2010	ABC	ABC Studios	No
Dancing With the Stars	2010	ABC	BBC Worldwide Prods	Yes
Desperate Housewives	2010	ABC	ABC Studios	No
Detroit 1-8-7	2010	ABC	ABC Studios	No
Extreme Makeover: Home Edition	2010	ABC	Endemol	Yes
Grey's Anatomy	2010	ABC	ABC Studios	No
Middle, The	2010	ABC	Warner Bros	No
Modern Family	2010	ABC	Fox	No
My Generation	2010	ABC	ABC Studios	No
No Ordinary Family	2010	ABC	ABC Studios	No
Private Practice	2010	ABC	ABC Studios	No
Saturday Night College Football	2010	ABC	ABC Sports	No
Secret Millionaire	2010	ABC	RDF USA Prods	Yes
Whole Truth, The	2010	ABC	Warner Bros	No
\$#*! My Dad Says	2010	CBS	Warner Bros	No
48 Hours	2010	CBS	CBS News	No
60 Minutes	2010	CBS	CBS News	No
Amazing Race, The	2010	CBS	CBS Productions	No
Big Bang Theory	2010	CBS	Warner Bros	No

Blue Bloods	2010	CBS	CBS Television Studios	No
Criminal Minds	2010	CBS	ABC Studios	No
CSI: Crime Scene Investigation	2010	CBS	CBS	No
CSI: Miami	2010	CBS	CBS	No
CSI: NY	2010	CBS	CBS	No
Defenders, The	2010	CBS	CBS Television Studios	No
Good Wife, The	2010	CBS	CBS Productions	No
Hawaii Five-O	2010	CBS	CBS Television Studios	No
How I Met Your Mother	2010	CBS	Fox	No
Medium	2010	CBS	CBS	No
Mentalist, The	2010	CBS	Warner Bros	No
Mike & Molly	2010	CBS	Warner Bros	No
NCIS	2010	CBS	CBS Television Studios	No
NCIS: Los Angeles	2010	CBS	CBS Television Studios	No
Rules of Engagement	2010	CBS	Sony and CBS	No
Survivor	2010	CBS	Mark Burnett Productions	Yes
Two and a Half Men	2010	CBS	Warner Bros	No
Undercover Boss	2010	CBS	Studio Lambert	Yes
90210	2010	CW	CBS Productions	No
America's Next Top Model	2010	CW	10 by 10 Entertainment	Yes
Gossip Girl	2010	CW	Warner Bros	No
Hellcats	2010	CW	Warner Bros	No
Life Unexpected	2010	CW	CBS/Warner Bros	No
Nikita	2010	CW	Warner Bros	No
One Tree Hill	2010	CW	Warner Bros	No
Smallville	2010	CW	Warner Bros	No
Supernatural	2010	CW	Warner Bros	No
Vampire Diaries, The	2010	CW	CBS/Warner Bros	No
American Dad	2010	Fox	Fox	No
America's Most Wanted	2010	Fox	Fox	No
Bones	2010	Fox	Fox	No
Cleveland Show, The	2010	Fox	Fox	No

Cops	2010	Fox	Fox	No
Family Guy	2010	Fox	Fox	No
Fringe	2010	Fox	Warner Bros	No
Glee	2010	Fox	Fox	No
Good Guys, The	2010	Fox	Fox Television Studios	No
Hell's Kitchen	2010	Fox	ITV Studios in association with A Smith & Co. Prods	Yes
House	2010	Fox	Universal	No
Human Target	2010	Fox	Warner Bros	No
Lie to Me	2010	Fox	Fox	No
Lonestar	2010	Fox	20th Century Fox Television	No
OT, The	2010	Fox	Fox Sports	No
Raising Hope	2010	Fox	20th Century Fox Television	No
Running Wilde	2010	Fox	Tantamount Studios, Five Hole Pictures, Principato-Young Management, Lionsgate Television	Yes
Simpsons, The	2010	Fox	Fox	No
30 Rock	2010	NBC	NBC Universal	No
Biggest Loser, The	2010	NBC	Shine International	Yes
Chase	2010	NBC	Warner Bros	No
Chuck	2010	NBC	Warner Bros	No
Community	2010	NBC	Krasnoff Foster Prods/Sony Pictures Television	Yes
Dateline NBC	2010	NBC	NBC News	No
Event, The	2010	NBC	Universal Media Studios and Steve Stark Prods	No
Football Night in America	2010	NBC	NBC Sports	No
Law & Order: Los Angeles	2010	NBC	NBC Universal	No
Law & Order: SVU	2010	NBC	NBC Universal	No
Love Bites	2010	NBC	Universal Media Studios and Working Title Television	No
Office, The	2010	NBC	NBC Universal	No
Outlaw	2010	NBC	Universal Media Studios	No
Outsourced	2010	NBC	Universal Media Studios	No
Parenthood	2010	NBC	NBC Universal	No
School Pride	2010	NBC	Horizon Alternative Television (Warner Bros)	No

Sunday Night Football	2010	NBC	NBC Sports	No
Undercovers	2010	NBC	Warner Bros	No
Who Do You Think You Are	2010	NBC	Wall to Wall Prods, Is or Isnt' Entertainment, Shed Media,U.S.	Yes

II. Cable Programming List (2007-2008, 2008-2009, 2009-2010)

Series Title	Season	Network	Studio/Producer	Independently Produced?
CLEANER, THE	2007-2008	A&E	CBS	No
GREEK	2007-2008	ABC Family	Disney/ABC	No
KYLE XY	2007-2008	ABC Family	Disney/ABC	No
LINCOLN HEIGHTS	2007-2008	ABC Family	Disney Enterprises	No
MIDDLEMAN, THE	2007-2008	ABC Family	Disney/ABC	No
SECRET LIFE OF THE AMERICAN TEENAGER, THE	2007-2008	ABC Family	Disney/ABC	No
WILDFIRE	2007-2008	ABC Family	Lionsgate	Yes
BREAKING BAD	2007-2008	AMC	Sony	Yes
MAD MEN	2007-2008	AMC	Lionsgate	Yes
DIRT	2007-2008	FX	Disney/ABC	No
IT'S ALWAYS SUNNY IN PHILADELPHIA	2007-2008	FX	Fox	No
NIP/TUCK	2007-2008	FX	Time Warner	No
RESCUE ME	2007-2008	FX	Sony	Yes
RICHERS, THE	2007-2008	FX	Fox	No
SHIELD, THE	2007-2008	FX	Fox	No
ARMY WIVES	2007-2008	Lifetime	Disney/ABC	No
BLOOD TIES	2007-2008	Lifetime	Insight Film Studios	Yes
HUMAN GIANT	2007-2008	MTV	Viacom	No
KAYA	2007-2008	MTV	Viacom	No
FACTORY	2007-2008	Spike	Viacom	No
BATTLESTAR GALACTICA	2007-2008	SyFy	NBCUni	No
EUREKA	2007-2008	SyFy	NBCUni	No
FLASH GORDON	2007-2008	SyFy	RHI Entertainment	Yes
STARGATE: ATLANTIS	2007-2008	SyFy	MGM	Yes
10 ITEMS OR LESS	2007-2008	TBS	Sony	Yes
BILL ENGVALL SHOW, THE	2007-2008	TBS	Time Warner	No
FRANK TV	2007-2008	TBS	Time Warner	No
MY BOYS	2007-2008	TBS	Sony	Yes
TYLER PERRY'S HOUSE OF PAYNE	2007-2008	TBS	The Tyler Perry Company	Yes
CLOSER, THE	2007-2008	TNT	Time Warner	No
SAVING GRACE	2007-2008	TNT	Fox	No
BURN NOTICE	2007-2008	USA	Fox	No
DEAD ZONE, THE	2007-2008	USA	Lionsgate	Yes

IN PLAIN SIGHT	2007-2008	USA	NBCUni	No
LAW & ORDER: CRIMINAL INTENT	2007-2008	USA	NBCUni	No
MONK	2007-2008	USA	NBCUni	No
PSYCH	2007-2008	USA	NBCUni	No
BEAST, THE	2008-2009	A&E	Sony	Yes
CLEANER, THE	2008-2009	A&E	CBS	No
10 THINGS I HATE ABOUT YOU	2008-2009	ABC Family	Disney/ABC	No
GREEK	2008-2009	ABC Family	Disney/ABC	No
KYLE XY	2008-2009	ABC Family	Disney/ABC	No
LINCOLN HEIGHTS	2008-2009	ABC Family	Disney Enterprises	No
MAKE IT OR BREAK IT	2008-2009	ABC Family	Disney/ABC	No
ROOMMATES	2008-2009	ABC Family	Disney/ABC	No
RUBY & THE ROCKITS	2008-2009	ABC Family	Disney/ABC	No
SECRET LIFE OF THE AMERICAN TEENAGER, THE	2008-2009	ABC Family	Disney/ABC	No
BREAKING BAD	2008-2009	AMC	Sony	Yes
MAD MEN	2008-2009	AMC	Lionsgate	Yes
DEFYING GRAVITY	2008-2009	BBC	Fox	No
SOMEBODIES	2008-2009	BET	Generate	Yes
CHOCOLATE NEWS	2008-2009	Comedy Central	Viacom	No
IMPORTANT THINGS WITH DEMETRI MARTIN	2008-2009	Comedy Central	Viacom	No
KRÖD MĀNDŌON AND THE FLAMING SWORD OF FIRE	2008-2009	Comedy Central	MRC	Yes
LEWIS BLACK'S ROOT OF ALL EVIL	2008-2009	Comedy Central	Viacom	No
MICHAEL AND MICHAEL HAVE ISSUES	2008-2009	Comedy Central	Viacom	No
RENO 911!	2008-2009	Comedy Central	Viacom	No
SARAH SILVERMAN PROGRAM, THE	2008-2009	Comedy Central	Viacom	No
SOUTH PARK	2008-2009	Comedy Central	Viacom	No
TOSH.0	2008-2009	Comedy Central	Viacom	No
DAMAGES	2008-2009	FX	Sony	No

IT'S ALWAYS SUNNY IN PHILADELPHIA	2008-2009	FX	Fox	No
NIP/TUCK	2008-2009	FX	Time Warner	No
RESCUE ME	2008-2009	FX	Sony	Yes
SONS OF ANARCHY	2008-2009	FX	20th Century Fox	No
TESTEES	2008-2009	FX	Blueprint Entertainment	Yes
ARMY WIVES	2008-2009	Lifetime	Disney/ABC	No
DROP DEAD DIVA	2008-2009	Lifetime	Sony	Yes
RITA ROCKS	2008-2009	Lifetime	MRC	Yes
MOCAP, LLC	2008-2009	Spike	Worldwide Biggies	Yes
BATTLESTAR GALACTICA	2008-2009	SyFy	NBCUni	No
EUREKA	2008-2009	SyFy	NBCUni	No
MERLIN	2008-2009	SyFy	Shine	Yes
SANCTUARY (SCI FI)	2008-2009	SyFy	Stage 3 Media	Yes
STARGATE: ATLANTIS	2008-2009	SyFy	MGM	Yes
WAREHOUSE 13	2008-2009	SyFy	NBCUni	No
10 ITEMS OR LESS	2008-2009	TBS	Sony	Yes
BILL ENGVALL SHOW, THE	2008-2009	TBS	Time Warner	No
FRANK TV	2008-2009	TBS	Time Warner	No
MY BOYS	2008-2009	TBS	Sony	Yes
TYLER PERRY'S MEET THE BROWNS	2008-2009	TBS	The Tyler Perry Company	Yes
TYLER PERRY'S HOUSE OF PAYNE	2008-2009	TBS	The Tyler Perry Company	Yes
CLOSER, THE	2008-2009	TNT	Time Warner	No
DARK BLUE	2008-2009	TNT	Time Warner	No
HAWTHORNE	2008-2009	TNT	Sony	Yes
LEVERAGE	2008-2009	TNT	Electric Entertainment	Yes
RAISING THE BAR	2008-2009	TNT	Disney/ABC	No
SAVING GRACE	2008-2009	TNT	Fox	No
TRUST ME	2008-2009	TNT	Time Warner	No
BURN NOTICE	2008-2009	USA	Fox	No
IN PLAIN SIGHT	2008-2009	USA	NBCUni	No
LAW & ORDER: CRIMINAL INTENT	2008-2009	USA	NBCUni	No
MONK	2008-2009	USA	NBCUni	No
PSYCH	2008-2009	USA	NBCUni	No
ROYAL PAINS	2008-2009	USA	NBCUni	No
STARTER WIFE, THE	2008-2009	USA	NBCUni	No

GLADES, THE	2009-2010	A&E	Fox	No
10 THINGS I HATE ABOUT YOU	2009-2010	ABC Family	Disney/ABC	No
GREEK	2009-2010	ABC Family	Disney/ABC	No
HUGE	2009-2010	ABC Family	Disney/ABC	No
LINCOLN HEIGHTS	2009-2010	ABC Family	Disney Enterprises	No
MAKE IT OR BREAK IT	2009-2010	ABC Family	Disney/ABC	No
MELISSA & JOEY	2009-2010	ABC Family	Disney/ABC	No
PRETTY LITTLE LIARS	2009-2010	ABC Family	Time Warner	No
SECRET LIFE OF THE AMERICAN TEENAGER, THE	2009-2010	ABC Family	Disney/ABC	No
BREAKING BAD	2009-2010	AMC	Sony	Yes
MAD MEN	2009-2010	AMC	Lionsgate	Yes
RUBICON	2009-2010	AMC	Time Warner	No
BIG LAKE	2009-2010	Comedy Central	Lionsgate	Yes
IMPORTANT THINGS WITH DEMETRI MARTIN	2009-2010	Comedy Central	Viacom	No
JEFF DUNHAM SHOW, THE	2009-2010	Comedy Central	Viacom	No
SARAH SILVERMAN PROGRAM, THE	2009-2010	Comedy Central	Viacom	No
SECRET GIRLFRIEND	2009-2010	Comedy Central	Viacom	No
SOUTH PARK	2009-2010	Comedy Central	Viacom	No
TOSH.0	2009-2010	Comedy Central	Viacom	No
UGLY AMERICANS	2009-2010	Comedy Central	Viacom	No
ARCHER	2009-2010	FX	Fox	No
DAMAGES	2009-2010	FX	Sony	Yes
IT'S ALWAYS SUNNY IN PHILADELPHIA	2009-2010	FX	Fox	No
JUSTIFIED	2009-2010	FX	Sony	Yes
LEAGUE, THE	2009-2010	FX	Fox	No
LOUIE	2009-2010	FX	Fox	No
NIP/TUCK	2009-2010	FX	Time Warner	No
RESCUE ME	2009-2010	FX	Sony	Yes
SONS OF ANARCHY	2009-2010	FX	20th Century Fox	No
ARMY WIVES	2009-2010	Lifetime	Disney/ABC	No

DROP DEAD DIVA	2009-2010	Lifetime	Sony	Yes
RITA ROCKS	2009-2010	Lifetime	MRC	Yes
SHERRI	2009-2010	Lifetime	Viacom	No
HARD TIMES OF RJ BERGER	2009-2010	MTV	Viacom	No
WARREN THE APE	2009-2010	MTV	Viacom	No
BLUE MOUNTAIN STATE	2009-2010	Spike	Lionsgate	Yes
PLAYERS	2009-2010	Spike	Viacom	No
SUPER DAVE'S SPIKE- TACULAR	2009-2010	Spike	Viacom	No
CAPRICA	2009-2010	SyFy	NBCUni	No
EUREKA	2009-2010	SyFy	NBCUni	No
HAVEN	2009-2010	SyFy	Piller/Segan	Yes
MERLIN	2009-2010	SyFy	Shine	Yes
OUTER SPACE ASTRONAUTS	2009-2010	SyFy	Russell Barrett Productions	Yes
SANCTUARY	2009-2010	SyFy	Stage 3 Media	Yes
SGU: STARGATE UNIVERSE	2009-2010	SyFy	MGM	Yes
WAREHOUSE 13	2009-2010	SyFy	NBCUni	No
ARE WE THERE YET?	2009-2010	TBS	AWTY Productions	Yes
MY BOYS	2009-2010	TBS	Sony	Yes
NEIGHBORS FROM HELL	2009-2010	TBS	Fox	No
TYLER PERRY'S MEET THE BROWNS	2009-2010	TBS	The Tyler Perry Company	Yes
TYLER PERRY'S HOUSE OF PAYNE	2009-2010	TBS	The Tyler Perry Company	Yes
CLOSER, THE	2009-2010	TNT	Time Warner	No
DARK BLUE	2009-2010	TNT	Time Warner	No
HAWTHORNE	2009-2010	TNT	Sony	Yes
LEVERAGE	2009-2010	TNT	Electric Entertainment	Yes
MEMPHIS BEAT	2009-2010	TNT	Time Warner	No
MEN OF A CERTAIN AGE	2009-2010	TNT	Time Warner	No
RAISING THE BAR	2009-2010	TNT	Disney/ABC	No
RIZZOLI AND ISLES	2009-2010	TNT	Time Warner	No
SAVING GRACE	2009-2010	TNT	Fox	No
SOUTHLAND	2009-2010	TNT	Time Warner	No
HOT IN CLEVELAND	2009-2010	TV Land	Viacom	No
LOVE THAT GIRL	2009-2010	TV1	Equitable Shares, LLC	Yes
BURN NOTICE	2009-2010	USA	Fox	No

COVERT AFFAIRS	2009-2010	USA	NBCUni	No
IN PLAIN SIGHT	2009-2010	USA	NBCUni	No
LAW & ORDER: CRIMINAL INTENT	2009-2010	USA	NBCUni	No
PSYCH	2009-2010	USA	NBCUni	No
ROYAL PAINS	2009-2010	USA	NBCUni	No
WHITE COLLAR	2009-2010	USA	Fox	No